

STATE OF MICHIGAN
IN THE SUPREME COURT

Clerk of The Court
P.O. Box 30052
Lansing Michigan 48909

Case No: 160034

RE: People of The STATE OF Michigan Plaintiff v. Edward L. Finley Jr.

Please Find for Filing:

1. Defendants Amicus Curiae Brief
2. Memorandum of Law in Support
3. Exhibits [A] through [D]
4. Relief Sought
5. Verification, Affirmation in lieu of oath 28 U.S.C. 1746

Please file this Pleading(s) before this Court for adjudication
on the merits presented in accord with "People v. Manning SC 160034"

Truly

15/ Edward L. Finley Jr.

Edward L. Finley Jr. # 406969

Defendant of Record

Chippewa Correctional Facility

4269 W. M-80

Kincheloe, Michigan 49784



ELF/Tdb

Enclosure

XC: Legal file

STATE OF MICHIGAN
IN THE SUPREME COURT

People of The State of Michigan
Plaintiff



Case No: 160034

V.
Edward L. Finley Jr.
Defendant

Motion For Leave To file And
Consider An Amicus Curiae Brief.

Now Comes, Edward Finley Jr. (hereafter - defendant) moves this Court to consider the circumstances of defendant's case when deciding "Mannings" case and grant Leave to Finley allowing him to file an amicus brief pursuant to MCL 7.312(H) and for the following reasons;

1. Edward L. Finley Jr., is an interested party and has a strong interest in the subject matter and the determination of the issues presented in the case of "People v. Manning SC 160034".
2. On 9-20-1999, Monday afternoon, inside Redford High School, Finley was arrested without a warrant at the age of 16 by Detroit Police Officer "Unknown Crimes" from the 8th Precinct.
3. On 9-20-99, a petition was filed by the Detroit Police Department with the Wayne County Juvenile Court (WCJC) (#99-22667-0) Delinquency Jacket 99-3833830 charging defendant with "Disorderly Conduct - Fighting", under statute MD 906.207. (See Register of Actions PGU (See PST))
4. On 11-15-1999, Finley initially appeared in front of the court for disposition, sentencing and discharge contrary to MCL 764.27 and which there is no record of. (See memorandum of Law).
5. No hearings were held outside of Finley's initial appearance for disposition, sentencing and discharge.
6. There is no record or transcript of any disposition, sentencing or any other hearings. There is no record of any court order being issued by the Juvenile Court releasing defendant from their jurisdiction.

7. The Juvenile Court was authorized to exercise continuing Jurisdiction over the 16 year old defendant, within its Jurisdiction until defendant reached 19. (See memorandum of Law).

8. Mich. Const. 1963 Art 6 sec. 15, grants Probate Courts 'original Jurisdiction' in all cases of Juvenile delinquents.

9. These statutory Provisions /Michigan Compiled Laws (i.e. MCL 712A.2(a)(1), MCL 712A.2(a)(5)...) has not been adhered to, because the district and Circuit Court of the Criminal Division acted beyond the Limits of its Power(s). (See memorandum of Law).

10. The district and Circuit Court of the Criminal division blatantly disregarded what the Legislature has intended within MCL 712A.2(a)(1), MCL 712A.2(a)(5)... where these Laws has not been repealed or rescinded. (See memorandum of Law).

11. There were no hearings or evaluations held or performed to determine whether or not defendant had any mental illness...

12. On April 12 2002, defendant was sentenced to a Natural Life without Parole and 2 years to run Consecutive without the consideration of any mitigating factors or circumstances, under the assumed Jurisdiction of the Criminal Circuit Court at the age of 19.

13. On April 25 2002, at the age of 19, a psychological report was done by Dr. Robert Houle, M.A., Psychologist, P-11 # 13134, diagnosing this defendant impulsive... (See Psych report as Exhibit B).

14. This diagnosis shows that although defendant was 18 years, 4 months and 2 days old at the time the crime was committed, he was still a juvenile as his psych report shows at the age of 19.

15. The decisions of "Miller"; should extend to individuals 18 and older; in conjunction with MCL 712A.2(a)(1)... providing defendant(s) that's similarly situated with the same Protections as juveniles 17 and under.

STATE OF MICHIGAN
IN THE SUPREME COURT

People of The State of Michigan
Plaintiff

Case no: 160034

v.
Edward L. Finley Jr.
Defendant

Memorandum of Law In
Support of AMICUS CURIAE
BRIEF

By: Edward L. Finley Jr. #406969
Defendant of Record
Chippewa Correctional Facility
4269 W. M-80
Kincheloe Michigan 49784



STATEMENT OF FACTS

On 9-20-1999, Monday afternoon, inside Redford High School, 16 year old defendant Finley was arrested without a warrant by Detroit Police Officer "unknown Grimes", from the 8th Precinct and was not immediately taken in front of a Judge or magistrate per MCL 764.27, instead was taken to the 8th Precinct and Finger Printed, then allowed to go into the custody of his dad.

According to defendant's pre-sentence investigation report (PSIR) the Detroit Police Department filed a petition on 9-20-99, against defendant charging Finley with "Disorderly Conduct - fighting" under statute 00906207 under the Jurisdiction of the Wayne County Juvenile Court (WCJC) Petition number #99-22667-0, Delinquency Jacket no: 99-385383D under MCL 712A.2(a)(1).

On 11-15-99, defendant first appeared in front of the Juvenile Court where the disposition, sentence and discharge took place (See PSIR as Ex. C).

No order from the WCJC's Wayne County Juvenile Court was issued, releasing this defendant from its Jurisdiction per MCL 712A.2(a)(1), divesting the criminal division courts (i.e., District + Circuit) of Jurisdiction. (MCL 712A.2(a)(1) as Exhibit D).

On July 11, 2001, this defendant was arrested without a warrant by Detroit Police Officer Gary Diaz Narcotics Division at the age of 18 years, 4 months and 2 days old and was not immediately taken in front of a Judge or magistrate in violation of MCL 764.13, MCL 780.13, MCL 764.26 and MCR 6.104(A). Nor is there a record of an "automatic Waiver" Process.

On July 16, 2001, according to defendant's Register of Actions, he was arraigned + charged with first-degree Premeditated Murder and Felony Firearm in District Court of the Criminal Division.

On July 30, 2001, defendant was bound over to the Circuit Court of the criminal division for trial.

On March 27, 2002, defendant was convicted of first-degree Premeditated Murder and Felony Firearm.

STATEMENT OF FACTS cont...

On April 12 2002, defendant was sentenced to a Natural Life without Parole and 2 years to run consecutive without the consideration of any mitigating circumstances.

On April 25 2002, at the age of 19, defendant was diagnosed as impulsive, immature..., by Dr. Robert Houle, M.A., Psychologist, P-11 # 13134.

Memorandum of Law IN Support

Contrary to Mich. Const. 1963 Art 3 sec. 2; Mich. Const. 1963 Art 6 sec. 15; MCL 712A.2(a)(1); MCL 712A.2(a)(5); In re Scherman 2009 Mich. App. 1882; In re Brown 151 US 242 (1894); In re Forfeiture of Certain Personal Effects 441 Mich. 71, 85 (1992); People v. Schumacher 240 Mich. App. 420 (2000); In re Minor 2010 Mich. App. 2067, the criminal division courts acted beyond their limits of its Power(s), where Jurisdiction was taken where it clearly did not exist in an excess of Jurisdiction.

The district + Circuit Court of the Criminal division, failed to uphold these clear and plain provisions of Law and the Constitution, which can not be regarded as mere error in Judgment, but deliberate unauthorized, unlawful arbitrary assumption and exercise of Power.

Jurisdiction was taken where it clearly did not exist, because there was and is no record of "automatic waiver" Process, nor is there a record of a court order, releasing this defendant from the Jurisdiction of the Juvenile Court Per MCL 712A.2(a)(1).

LEGAL ARGUMENT

Because the 18 year, 4 month and 2 days old defendant was not properly released from the Jurisdiction of the Juvenile Court by Court order and no record of any automatic waiver motion or Process, the district and Circuit Court of the Criminal division assumed Jurisdiction, rendering their Judgment(s) void for the excess and because defendant was diagnosed as impulsive... at the age of 19, defendant should have been provided the same Protections as juveniles 17 and under.

Mich. Const. 1963 Art 6, sec 15, grants Probate Courts 'original jurisdiction' in all cases of Juvenile delinquents... In the case of "In re Sherman 2009 Mich. App. Lexis 1882", MCL 712A.2, provided that the family court has following authority and jurisdiction: "[a] exclusive original jurisdiction superior to and reclusive of the jurisdiction of another court in proceedings concerning a juvenile under 17 years of age who is found within the County if... the juvenile has violated any municipal ordinance..." which in defendant Finley's case established jurisdiction and the juvenile court continues to have jurisdiction until defendant Finley is released by Court Order per MCL 712A.2(c)(1) or an "automatic waiver" motion is filed + granted which there is no record of court order or waiver motion.

The Juvenile Court took jurisdiction over the 16 year old Finley before his 17th birthday when he first came within the juvenile courts jurisdiction by the filing of a petition by the Detroit Police Department and MCL 712A.2(c)(1), authorized the juvenile court to continue jurisdiction, therefore maintaining this jurisdiction at the time defendant was arrested + convicted of first degree premeditated murder and felony firearm at 18 years, 4 months and 2 days old. In re Moore, Matter of Terrance Harris, in "Minor" defendant Harris came in to the jurisdiction of the Juvenile Court at 16 years old in [2005] and this court continued jurisdiction over Harris, until he was 21. "In re minor 2010 Mich. App. Lexis 2067; People v. Lasplina (In re Lasplina) 2019 Mich. App. Lexis 8153.

In "Schumacher" and Mich. App. Lexis 2000", if the court determined that the juvenile had not presented a serious risk to public safety... the court would continue its jurisdiction over the juvenile. In Finley's case, the court determined that defendant had not presented a serious risk to the public safety, so defendant was released to the custody of his dad at the age of 16, however was not released from the jurisdiction under MCL 712A.2(c)(1).

In "In re Sherman" the doctrine of prior exclusive jurisdiction has been recognized in Michigan giving In re for failure of certain Personal Property 441 Mich. 77, 85 (1992) states "the doctrine generally provides that once a court has exercised jurisdiction, other courts of 'Co-ordinate authority' may not interfere with the action taken by the first court. Id. In defendants Finley's case the

Juvenile Court exercised jurisdiction over him and chose not to release jurisdiction over defendant by not issuing a court order per MCL 712A.2(a)(1) and choosing not to waive jurisdiction, the district and Circuit Court of the criminal division should not have interfered with the Juvenile Courts, choice by assuming jurisdiction unlawfully.

The assumed jurisdiction over defendant by the district + Circuit Court was unauthorized, unlawful arbitrary assumption and exercise of power, when it was taken, where it clearly did not exist, because a court order releasing jurisdiction was never issued for Finley per MCL 712A.2(a)(1).

These statutory provisions / Michigan Compiled Laws has not been adhered to, because the district and Circuit Court of the criminal division acted beyond the limits of its power(s), when it assumed jurisdiction departing from the recognized and established requirements of MCL 712A.2(a)(1), MCL 712A.2(a)(5), the effect of which deprived defendant of his Constitutional rights under (Due Process) Mich. Const. 1963 Art 1 sec 17; U.S. Const. Amend 5 14 (Equal Protection); Mich. Const. 1963 Art 1 sec 2; U.S. Const. Amend 14. Therefore, the Judgment(s) rendered by the district and Circuit court of the Criminal division is void for the excess.

No correction can be made of said Judgment by the district and Circuit court as where neither court, under Law had jurisdiction over defendant or the case, that is, no right to take cognizance of the offense, defendant committed at 18 years, 4 months and 2 days old and defendant must now be entirely discharged.
In re Boone 151 US 242 (1894).

The district and Circuit Court of Wayne County Criminal division, blatantly disregarded what the legislature had intended within MCL 712A.2(a)(1), MCL 712A.2(a)(5), when these provisions has not been repealed or rescinded. Also, disregarded the fact that there was no automatic waiver or court order releasing Finley from the Juvenile Courts Jurisdiction on record.

Mich Const. 1963 Art 3. sec. 2 (Separation of Powers Act), has been violated by the district and Circuit Courts when they conflicted with the

legislatures intent and when these criminal courts departed from the recognized and established requirements of MCL 712A.2(a)(1), MCL 712A.2(a)(5) (i.e. law) and these courts had no power to deal with (1) the kind of matter in defendant's case at that time (2) the particular person concerned (i.e. defendant Finley) and (3) the judgment or order issued by these criminal courts is of a kind that had no power to issue, because defendant was by law, still under the Jurisdiction of the Juvenile Court. Although defendant was older than 17 at the time the charges of first-degree premeditated murder and Felony Firearm were filed, does not negate the fact that, there is no record of any waiver of jurisdiction or court order releasing jurisdiction.

Although defendant was 18 at the time the crime was committed, defendant was still a juvenile with an under developed brain and the qualities that distinguish juveniles from adults, does not disappear when individuals turn 18. In Finley's case, these qualities did not disappear even when he turned 19. (See Reper v. Simmons 543 U.S. at 568); (See Psych Report as Exhibit B).

There were no hearings or evaluations held or performed to determine whether or not defendant had any mental illness, was legally insane at the time of the offense, acting with a diminished capacity, acting on sudden, uncontrollable, irresistible or any other impulse, defendant's lesser responsibility and culpability was not considered, instead these courts in their assumption of jurisdiction, assumed defendant cognitive capacity was mature, simply because defendant was 18, when in fact defendant was mentally impaired at 19 and by definition had diminished capacity to control impulse. (See Atkins v. Virginia 536 U.S. 304 (2002), (See Psych Report as Exhibit B)

Dr. Lawrence Steinberg (i.e. expert) defined late adolescent as between ages 18 and 21 and "still show problems with impulse control"... as defendant Finley (See Finley's Psych report as Exhibit B).

Dr. Steinberg also stated that they are more capable of change than are adults (See Steinberg Tr. at 11; Tr. at 19, Id at 2; Cruz 2018 U.S. Dist. Lexis 52924; See Also U.S. v. C.R. 792 F.Supp. 2d 343 (2011).

In addition, a Psychological evaluation was done by Dr. Robert Hule, M.A., Psychologist, P-11 # 13134, diagnosing Finley's impulsive... and recommended defendant for inclusion into assaultive offender group psychotherapy. (see Psych report as Exhibit B).

This diagnosis shows that although defendant was 18 years, 4 months and 2 days old, he still was a juvenile even at 19, with an underdeveloped brain and problems with impulse control, which explains the actions at that time the crimes was committed and the results found by Dr. Hule, which also shows that defendant Finley even at 19, displayed the same characteristics as juveniles 17 and under.

This defendant should have received the same protections as an juvenile and the decisions of "Miller", should extend to 18 and older, in conjunction with MCL 712A.2(a)(1), MCL 712A.2(a)(5)...

WHEREFORE, defendant asks this court to consider the circumstances of Finley's case when making a decision in "People v. Manning's" case and extend the age to 19 or older in conjunction with MCL 712A.2(a)(1) and afford defendant(s) and others with similar situated circumstances the same protections as juveniles under Miller, 17 and under.

Verification

Verification is made in accord with 28 U.S.C. 1746 by way of affirmation in lieu of oath the averments presented are presented by personal knowledge of actual facts and this defendant will testify to the same in a Court of Law under the penalty of perjury if called as a witness.

Further Affiant saith not

Affiant

/s/ Edward L. Finley Jr.

Edward L. Finley Jr. 406969
Affiant of record
Chippewa Correctional Facility
4269 W. M-80
Kincheloe Michigan 49784



Date: 8/24/2020

(A)

THIRD JUDICIAL CIRCUIT OF MICHIGAN

REGISTER OF ACTIONS

CASE NO. 99-022667-O

In The Matter Of Edward Lee Finley

§
§
§
§
§
§
§

Location: **Juvenile**
 Judicial Officer: **Ordinance Referee, Edward J. Joseph 00007**
 Filed on: **10/13/1999**
 Case Tracking Number: **99-022667-O**
 Referral Agency: **08 DETROIT POLICE 8TH-PRECINCT**
 Referral Number/Police: **815-621**
 Complaint Number (OCA):

CASE INFORMATION

Offense	Statute	Deg	Date	Case Type:
1. <u>DISORDERLY CONDUCT - FIGHTING</u>	00906207	.	09/20/1999	Ordinance

Related Cases

Lead Case

99-383383D-Jacket (Delinquency Jacket)

Statistical Closures

11/15/1999 Admission/No Contest

DATE

CASE ASSIGNMENT

Current Case Assignment

Case Number	99-022667-O
Court	Juvenile
Date Assigned	10/13/1999
Judicial Officer	Ordinance Referee, Edward J. Joseph 00007

PARTY INFORMATION

Minor - DL	Finley, Edward Lee <i>Unavailable Male</i> DOB: 03/09/1983 Age: 16
Mother	Finley, Zina Elayne <i>Also Known As Finley, Parent</i> <i>Also Known As Finley, Zina</i> <i>Black Female</i>
Father	Finley, Edward, Sr. <i>Black Male</i>



DATE

EVENTS & ORDERS OF THE COURT

INDEX

11/02/1999	O - Ordinance Citation Received	
11/15/1999	TL/O - Traffic/Ordinance First Appearance Party: Minor - DL Finley, Edward Lee	
11/15/1999	Disposition Part 4 Party: Minor - DL Finley, Edward Lee	
11/15/1999	O - Ordinance Hearing (Judicial Officer: Ordinance, Docket) <i>Held/Completed</i>	
11/15/1999	PC Closed by Ordinance Docket Child: Minor - DL Finley, Edward Lee	

Offense	Term	Interview Date	Institution
1 st Degree Murder	Life	04/25/02	RRC

Check here to verify that prisoner was informed of the limits of confidentiality and the fact that copies of this report will be placed
X in his Institutional File, Counselor File, and Central Office File, in addition to the confidential Health Record.

Use as much space as needed in each of the following narrative sections.

Reason For Referral:

Mr. Finley was seen by a psychologist at the Reception Center because that is the current practice.

Pertinent History/Background: *(Significant social, family, developmental, and criminal history or information. If AOP or SOP is recommended, provide brief account from prisoner as to what s/he did and why s/he did it. Clearly indicate to what degree the prisoner accepts or denies criminal responsibility. Do not simply repeat what is in PSI.)*

Mr. Finley indicates he was raised by both of his natural parents until approximately the year 2000. He states at that point, his father was incarcerated on a CSC charge. Mr. Finley indicates that his sister's were the victims of his father's criminal sexual conduct. He states that he did not physically react to his father's assault but was extremely upset at both his father and sisters. He states he was obviously mad at his father for what he had done but also mad at his sisters for not telling sooner. He states that he has reconciled with all the participants involved. He states that he got along very well with his father while growing up and also very well with his mother. He states he has no conflicts with them currently.

Mr. Finley indicates that prior to his incarceration, he was using alcohol approximately five to ten times per year. He also indicates that he was using marijuana two to three times per week. He denies other drug use although states that he did sell cocaine for awhile while he was out on the street.

Mr. Finley indicates there was a long-standing conflict with his victim and his victim's friends. He was not entirely clear on why this was occurring, but to the best of his ability explained it that his victim and his victim's friends were younger than him and trying to make a name for themselves and were using an ongoing conflict with Mr. Finley to boost their reputation in the neighborhood. Mr. Finley indicates he was threatened by his victim with a gun prior to the incident. He states that he told his parents about what was going on but there was no official action taken which made him mad. He states that his home was being vandalized by his victim prior to the incident. Mr. Finley indicates that he was sitting outside his home with his younger sister when the victim came up to his home and threatened him. He states that his victim started to pull a gun out of his pants, and Mr. Finley grabbed the rifle that his father had purchased for home protection. Mr. Finley states that he started to fire and hit his victim approximately three times in the face and chest. Mr. Finley indicates that his victim started to turn and run, and he continued to fire. He states that there was a ten shot clip in the gun and that he reloaded the gun. He states that he believes he shot approximately fifteen rounds and that the entire incident last between 20 and 30 seconds. He states that he and the 13 year old who happened to be with him at the time began to run and the police apprehended them.

Psychological Test Results: *(Briefly describe reception center psychological test findings.)*

Mr. Finley's MMPI-2 appears to be valid. He falls into the Megargee classifications of Delta, Easy and Item. An analysis of his profile suggests that he is a young man who is impulsive, prone to present himself in a traditional

RECEPTION CENTER PSYCHOLOGICAL REPORT	Patient Identification	
	Name:	FINLEY, Edward
Pg1	Number:	A-406969
	D.O.B.:	01/09/83

cc: Health Record Institutional File Counselor File Central Office File Prisoner



Michigan Department of Corrections
Presentence Investigation

CFJ-284
Rev. 11/97

Criminal Justice

Juvenile History

NO. 1 OF 1

Offense Date:	09/20/1999
Petition Date:	09/20/1999
Petitioning Agency:	Detroit PD
Charge(s) at Petition:	Disorderly Conduct - Fighting
Court of Jurisdiction:	WCJC Petition #99-22667
Final Charges:	
Adjudication Date/Method:	
Sentence/Disposition:	11-15-99 - Case warned and dismissed
Sentence/Disposition Date:	11/15/1999
Attorney Present:	Yes
Discharge Date:	11/15/1999

Notes:

Adult History

This investigation revealed no adult criminal history for this offender.

Gang Involvement

There has been no known prior gang involvement for the defendant.

CREDIT FOR TIME SERVED:

Time Served	Location	Dates	Total Days
Instant Offense	WCJ	7-11-01 to 4-10-02	274 days
Total Jail Credit			274 days

Family

Name	Relationship	Age	Address	Phone	Occupation
Finley, Edward , Sr.	Father	44	MDOC Michigan		
Gilmore, Natosha	Sister	25	Detroit, Michigan		
Finley, LaPree	Sister	20	Detroit, Michigan		
Finley, Regina	Sister	19	11301 W. Outer Drive Detroit, Michigan 48223	(313) 541-8919	
	Mother		Michigan		
Finley, Tamika	Sister		11301 W. Outer Drive	(313) 541-8919	
406969 - Finley, Edward L., Jr. 018452 07/06/2012-11:18:03					CFJ- 284 Page:3

(1D)

MCLS § 712A.2a

This document is current through Public Act 64 from the 2020 Legislative Session

Michigan Compiled Laws Service > Chapter 701-713 Probate Code (§§ 701.1 — 713.6) > Act 288 of 1939 (Chs. I — XIII) > Chapter XIIA Jurisdiction, Procedure, And Dispositions Involving Minors (§§ 712A.1 — 712A.32)

§ 712A.2a. Continuing jurisdiction beyond maximum age; voluntary foster care; extended guardianship assistance; jurisdiction over juvenile committing certain violations; juvenile under jurisdiction of department of corrections; definitions.

Sec. 2a.

- (1) Except as otherwise provided in this section, if the court has exercised jurisdiction over a juvenile under section 2(a) or (b) of this chapter, jurisdiction shall continue for a period of 2 years beyond the maximum age of jurisdiction conferred under section 2 of this chapter, unless the juvenile is released sooner by court order.
- (2) If the department files a report with the court under section 15 of the young adult voluntary foster care act, 2011 PA 225, MCL 400.655, the court shall determine whether it is in the youth's best interests to continue in voluntary foster care within 21 days of the filing of the report. A hearing is not required under this subsection, but may be held on the court's own motion or at the request of the youth or the department.
- (3) If the court finds that the voluntary foster care agreement is in the youth's best interests, the court shall issue an order containing individualized findings to support its determinations made under subsection (2) and close the case in accordance with section 19 of the young adult voluntary foster care act, 2011 PA 225, MCL 400.659. The individualized findings shall be based on the department's written report and other materials and information submitted to the court.
- (4) If the court has appointed a guardian under section 19a or 19c of this chapter for a youth age 16 or older, the court shall retain jurisdiction of the youth until the department determines the youth's eligibility to receive extended guardianship assistance under the young adult voluntary foster care act, 2011 PA 225, MCL 400.641 to 400.671, that shall be completed within 120 days of the youth's eighteenth birthday. If the department determines the youth will receive extended guardianship assistance, the court shall retain jurisdiction of the youth until that youth no longer receives guardianship assistance.
- (5) If the court has exercised jurisdiction over a juvenile under section 2(a)(1) of this chapter for an offense that, if committed by an adult, would be a violation or attempted violation of section 72, 83, 84, 86, 88, 89, 91, 110a(2), 186a, 316, 317, 349, 520b, 520c, 520d, 520g, 529, 529a, 530, or 531 of the Michigan penal code, 1931 PA 328, MCL 750.72, 750.83, 750.84, 750.86, 750.88, 750.89, 750.91, 750.110a, 750.186a, 750.316, 750.317, 750.349, 750.520b, 750.520c, 750.520d, 750.520g, 750.529, 750.529a, 750.530, and 750.531, or section 7401(2)(a)(i) or 7403(2)(a)(i) of the public health code, 1978 PA 368, MCL 333.7401 and 333.7403, jurisdiction may be continued under section 18d of this chapter until the juvenile is 21 years of age.
- (6) If the court exercised jurisdiction over a child under section 2(h) of this chapter, jurisdiction of the court continues until the order expires but action regarding the personal protection order after the respondent's eighteenth birthday is not subject to this chapter.

STATE OF MICHIGAN
IN THE SUPREME COURT

People of The State of Michigan
Plaintiff

Case no: 160034

V.
Edward L. Finley Jr.
Defendant

STATE OF MICHIGAN ☐
COUNTY OF CHIPPewa ☐ ss

PROOF OF SERVICE

Edward L. Finley Jr. #406969 hereby deposes and says that on August 24 2020, I personally handed an original and one copy of "Motion For Leave to file and consider an Amicus Curiae Brief, Memorandum of Law In Support with Exhibits [A] through [D], cover letter to be mailed to the below addresses through expedited mail process to P.C. Stain.

Michigan Supreme Court
P.O. Box 30052
Lansing Michigan 48909

Attorney Brittany Parling
150 W. Jefferson Avenue suite 2100
Detroit Michigan 48226-4438

1/s/ Edward L. Finley Jr.

Edward L. Finley Jr. #406969
Defendant of record
Chippewa Correctional Facility
4269 W. M-80
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Date: 8 / 24 2020

